

JP:MSM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

COMPLAINT

(T. 18, U.S.C. § 371)

ANDREW BENJAMIN and
YANCIE S. JACKSON,
also known as, "Mone Yukka,"

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS.:

JENNIFER MCINERNEY, being duly sworn, deposes and says
that she is a Special Agent with the United States Postal Service Office of the Inspector General
("USPS-OIG"), duly appointed according to law and acting as such.

In or about and between February 2015 and April 2015, both dates being
approximate and inclusive, within the Eastern District of New York and elsewhere, the
defendants ANDREW BENJAMIN and YANCIE S. JACKSON did knowingly and intentionally
conspire to steal, take and abstract articles and things from mail, package, bag, mail route and
other authorized depository for mail matter, in violation of Title 18, United States Code, Section
1708.

(Title 18, United States Code, Section 371)

The source of your deponent's information and the grounds for her belief are as
follows

1. I have been a Special Agent with USPS-OIG for more than four years. I have participated in numerous investigations into the theft of mail from USPS facilities in New York City and Long Island, have conducted physical surveillance, and executed search warrants.

2. I have personally participated in the investigation of the offense referred to above. I am familiar with the facts and circumstances of this investigation from: (a) my personal participation in this investigation, (b) reports made to me by other USPS employees and law enforcement agents, (c) physical surveillance of the activity reported herein and reports of physical surveillance conducted by others, and (e) review of surveillance video.

3. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I have hearsay knowledge. Because this affidavit is being submitted for the limited purpose of seeking authorization to arrest the above-specified defendants, I have not set forth each and every fact learned during the course of this investigation. Instead, I have set forth only those facts which I believe are necessary to establish probable cause to arrest the defendants.

4. The defendant ANDREW BENJAMIN is a letter carrier for the United States Postal Service ("USPS") assigned to the Far Rockaway, New York Post Office ("Far Rockaway Post Office"). A USPS employee (the "USPS Employee") at the Far Rockaway Post Office advised me that on or about February 13, 2015, BENJAMIN was assigned to collections, which required him to drive a postal truck to pick up mail along an assigned route. BENJAMIN was not assigned to make deliveries that day.

5. The USPS Employee advised me that on or about February 13, 2015, the defendant ANDREW BENJAMIN removed a priority-mail parcel (the "Parcel") from inside the


Far Rockaway Post Office and placed it on the postal truck that he was driving for his collection assignment. The USPS employee also informed me that the address on the Parcel was not an address on the collection route to which BENJAMIN had been assigned that day. The defendant ANDREW BENJAMIN left the Far Rockaway Post Office with the Parcel.

6. On or about April 30, 2015, USPS-OIG agents observed the defendant ANDREW BENJAMIN remove a parcel from the mail truck he was driving and hand it to the defendant YANCIE S. JACKSON. The parcel was not addressed to the defendant YANCIE S. JACKSON.

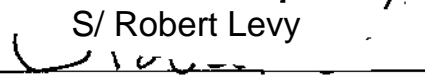
7. After BENJAMIN gave the parcel to JACKSON, USPS-OIG agents arrested the defendant ANDREW BENJAMIN and attempted to arrest the defendant YANCIE S. JACKSON. JACKSON ran from the USPS-OIG agents and was subsequently arrested.

8. The defendant YANCIE S. JACKSON was advised of his Miranda rights. He acknowledged understanding his Miranda rights and agreed to speak with USPS-OIG agents without an attorney present. In sum and substance and in part, the defendant YANCIE S. JACKSON stated that (1) he paid the defendant ANDREW BENJAMIN, who JACKSON knew was a postal worker, to take packages from the USPS in an effort to obtain drugs that were being shipped through the mail; (2) he had received three parcels from BENJAMIN, not including the parcel he received on or about April 30, 2015; and (3) the amount he would pay BENJAMIN depended on the value of the drugs in the packages that BENJAMIN gave him.

9. WHEREFORE, your deponent respectfully requests that the defendants
ANDREW BENJAMIN and YANCIE S. JACKSON be dealt with according to law.


JENNIFER MCINERNEY
Special Agent
United States Postal Service
Office of Inspector General

Sworn to before me this
30th day of April, 2015

S/ Robert Levy


THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK